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14  
15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

18 FEDERAL TRADE COMMISSION,  
19 Plaintiff,

20 v.

21 MICROSOFT CORP.,  
and  
22 ACTIVISION BLIZZARD, INC.

23 Defendants.  
24  
25  
26

Case No. 3:23-cv-02880-JSC

**DECLARATION OF PAGE ROBINSON IN  
SUPPORT OF DEFENDANT ACTIVISION  
BLIZZARD, INC.'S STATEMENT IN  
RESPONSE TO PLAINTIFF FEDERAL  
TRADE COMMISSION'S  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
SEALED (Civil L.R. 79-5(f)) [ECF NO. 226]**

Judge: Hon. Jacqueline Scott Corley

1 I, Page Robinson, declare as follows:

2 1. I am a Senior Director of Litigation and Intellectual Property at Activision  
3 Blizzard, Inc. (“Activision”). I submit this declaration in support of Activision’s Statement  
4 in Response to Plaintiff Federal Trade Commission’s Administrative Motion to Consider  
5 Whether Another Party’s Material Should be Sealed. In my role, I have personal  
6 knowledge of Activision’s use and protection of non-public, highly sensitive, and  
7 confidential business information, including the information at issue here.

8 2. I have personal knowledge of the facts set forth below, and I can and would  
9 competently testify to such facts if called to do so.

10 3. I have reviewed and am familiar with the portions of the Direct Testimony  
11 of Robin S. Lee by the FTC (“Lee Direct”) that Plaintiff filed under seal because they  
12 contained information designated by Activision as “Confidential.” Such information is  
13 identified in Plaintiff’s Administrative Motion to Consider Whether Another Party’s  
14 Material Should be Sealed (ECF No. 226) (the “Administrative Motion”).

15 4. As set forth in the Statement in Response to the Administrative Motion, the  
16 portions identified in Plaintiff’s Administrative Motion contain non-public and highly  
17 sensitive information, including, but not limited to, information reflecting Activision’s  
18 internal decision-making processes, strategic evaluation of forward-looking opportunities,  
19 business partnerships and negotiations, terms of existing confidential agreements, and  
20 internal business strategy.

21 5. This information could be used to injure Activision if made publicly  
22 available, and it would cause competitive harm to Activision if the above information was  
23 publicly disclosed. For example, disclosure of this information would give Activision’s  
24 competitors insight into Activision’s strategies, plans, and assessments regarding potential  
25 opportunities, and those competitors may alter their strategic plans or offerings if they  
26 knew Activision’s strategies and plans. Disclosure of this information would also harm  
27 Activision by allowing its competitors to circumvent the time and resources expended by  
28



**SIGNATURE ATTESTATION**

Pursuant to Civil Local Rule 5-1(h)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from any other signatory to this document.

Dated: July 3, 2023

/s/ Caroline Van Ness  
Caroline Van Ness